

News: Analysis & Commentary



COMMENTARY

By Peter Elstrom

LET THE TELECOM DOGFIGHT BEGIN

Have you noticed much change in your phone service since the Telecommunications Reform Act was passed a year ago? Don't worry. Nobody else has, either. Letting local and long-distance companies compete in each other's businesses will eventually mean lower prices and increased choice. But competition is being delayed by endless disputes between companies that seemingly would rather fight it out in the hearing room than in the marketplace.

That leaves most consumers with the same choices—and prices—they had before “deregulation.” Faced with high costs and other obstacles, long-distance companies are moving slowly into local service. AT&T resells local calling in only a handful of test markets, and MCI Communications Corp. has focused its local efforts on business customers. Meanwhile, the Baby Bells can't offer long-distance services until they prove that they face effective competition in their markets. So far, not one Bell has been able to prove that to regulators' satisfaction.

MORE CLOUT. What's the cost of this standoff? No one knows exactly. But in the local market alone, competition could cut costs by 20%, which amounts to \$50 million a day, estimates industry consultant Andrew Seybold.

It's time to cut the red tape and let true competition begin. Here's one way: Give state regulators the power to impose severe penalties on companies that thwart competition. Provided with that extra clout, regulators could let companies into new markets more quickly—knowing that

they have an effective recourse in case of wrongdoing.

It's understandable that state and federal regulators have been reluctant to let the Bells into long distance. Several of them have revealed their anticompetitive tendencies by dragging out negotiations over letting new entrants resell their call-carrying capacity. One recent trick is for Bells to force local competitors to fax them orders when customers want to change carriers: The faxed orders often are delayed or full of errors.

Clearly, Bells that deliberately

Competition could cut local costs by 20%, or \$50 million a day

block local competition deserve to remain barred from long distance. And state regulators should continue to make sure that the Bells comply with a 14-point checklist mandated by the Federal Communications Commission. Among other things, the FCC says that local incumbents must offer newcomers access to their local-calling networks at fair prices.

Sometimes, though, determining whether a local phone company has cleared all the hurdles is a judgment call. So to speed up deregulation, it makes sense to find ways to let competitors get into new businesses easily—while giving the authorities the power to swiftly punish anticompetitive practices.

Illinois is ready to try this ap-

proach. A bill passed by the state Senate in late March gives the Illinois Commerce Commission power to fine phone companies, including Ameritech Corp., for anticompetitive behavior. The financial penalties the commission can impose have jumped to \$30,000 per day per violation, up from \$2,000. Says Patrick O'Malley, the Republican state senator who sponsored the bill: “You need teeth in the enforcement mechanism.”

BROAD SUPPORT. Georgia's state senate recently passed a similar bill. It increases fines to \$15,000 initially and \$10,000 per day per violation—up from \$1,000 and \$500, respectively, now. Many other states, in contrast, cannot even fine the Bells for acting anticompetitively. Colorado regulators, for example, must get court approval before they can impose any financial penalty.

The Illinois law has won broad support among telecom companies. AT&T, MCI, and Sprint have all publicly backed it. AT&T's top executive in Illinois says he'll recommend using the bill as a model in other states that want to speed up competition. Even Ameritech supports the legislation, arguing that the penalties won't matter because it will play fair. “It's a good solution to put in safeguards to satisfy the skeptics,” says Peter Vujaklia, vice-president at Mercer Management Consulting. If the skeptics are satisfied, telecom customers can start seeing the savings that have only been a promise for more than a year.

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Mr. Marzo

BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE
STATE OF CALIFORNIA

MODERATORS:

KAREN JONES, JONATHON LAKRITZ, and WILLIAM SANDOVAL

JOINT
WORKSHOP

Order Instituting Rulemaking
on the Commission's Own Motion
into Competition for Local
Exchange Service.

R 95-04-043

Order Instituting Investigation
on the Commission's Own Motion
into Competition for Local
Exchange Service.

I 95-04-044

And Related Matters.

R 93-04-003.
I 93-04-002

25. List of Participants

REPORTER'S TRANSCRIPT

San Francisco, California
March 14, 1997
Pages 1213 - 1337
WS-20

Reported by: William J. Harter, CSR 3532
Deanna M. Zachlod, CSR 3251

1 SAN FRANCISCO, CALIFORNIA, MARCH 14, 1997 - 10:00 AM

2 * * * * *

3 MS. JONES: Let's be on the record.

4 This workshop is being held in dockets
5 R 95-04-043, I 95-04-044, and R 93-04-003 and
6 I 93-04-002.

7 It was ordered by the Judges in a prehearing
8 conference on Tuesday.

9 And the workshop notice, which I don't know if
10 it was mailed out, but it at least appeared on the
11 Commission calendar, indicates that we are to discuss
12 how the filings of Pacific Bell and GTE California
13 concerning Operation Support Systems can be supplemented
14 so they are more informative about how Pacific and GTEC
15 provide ordering, repair, and other functions for their
16 own retail services.

17 So that is a summary of our stated mandate
18 from the Judges.

19 Yesterday I received a fax from Pacific Bell,
20 from Sheila Howard, with a proposed agenda for this
21 workshop.

22 Was this made available to others?

23 MS. HOWARD: No, I did not. I just wanted to fax
24 it, and I brought a couple of copies. But I thought we
25 could talk about it. It's pretty -- I'm sorry.

26 (Shows her namecard)

27 MS. HOWARD: I could talk about it quickly.

28 What -- I kind of did the scope of the

1 workshop, more or less summarized what you said we
2 needed to do today, and then what he had proposed to do
3 is that we, first of all, put together a document
4 wherein we have identified within our filing the various
5 questions from pages 5 through 9 are -- our responses to
6 those various requirements on pages 5 through 9 are
7 found; and

8 Then what we were proposing to do is to
9 have -- we have subject matter experts here, technical
10 subject matter experts on the various areas, and they
11 were going to go through processing of a 1MB as
12 Judge McKenzie had suggested; and we're going to point
13 out where in the filing the various questions are
14 answered and how it works for a 1MB.

15 And I have copies of that for -- I hope enough
16 of -- I don't know if I have enough in here because
17 there is more than I thought, but there is some so maybe
18 we can share.

19 And then what we wanted to do is entertain
20 questions, of course.

21 And then, of course, what we'd like to
22 conclude with is just what Karen had announced earlier,
23 is we'd like to be able to have a way that we can
24 supplement or whatever is required so that our filing on
25 the 20th will meet the requirements correctly, or
26 sufficiently.

27 So any changes that we need to make.

28 MS. JONES: Are there any comments on that draft

1 agenda?

2 MR. HURST: Well, I haven't seen the draft agenda,
3 but I don't find a problem with the process that was
4 described except that I would like to propose -- this is
5 Michael Hurst for AT&T -- I would like to propose that
6 we do this by system, so that we do preordering,
7 ordering, provisioning, maintenance, and repair,
8 billing, and then interface each separately, so that
9 we -- at the end of the discussions for each of those
10 subsections we come to a conclusion about what needs to
11 be in the additional comments.

12 MS. HOWARD: Yes, that's what we planned to -- on
13 doing, Michael. That's the way we have it designed.

14 MR. GUTIERREZ: John Gutierrez from Continental.

15 Was it Pacific's intention to do it for both
16 resold as in addition to an unbundled basis?

17 MS. HOWARD: No, at this point in time we are doing
18 resale only.

19 We are not doing unbundled.

20 MR. KHANNA: Why not?

21 Dhruv Khanna.

22 MS. HOWARD: Well, since the Judge thought it would
23 be good to go through a LMB, a LMB would not be
24 an unbundled service; a LMB would be a resale.

25 So what -- based on what ALJ McKenzie had
26 suggested, we put together resale.

27 We can -- after we complete this exercise,
28 then we can take questions and see what needs to be done

1 to achieve the rest of your questions or answers to the
2 rest of your questions.

3 MS. JONES: Eric?

4 MR. ARTMAN: That's clearly unresponsive to the
5 Judges' direction.

6 We made clear, both at the hearing on the
7 record and afterwards in comments to GTEC and Pacific
8 that our real concern was the degree to which the OSS
9 addressed unbundled elements.

10 And given this total lack of a response or
11 intended lack of a response on a key area, I have a very
12 tough time maintaining what I felt was a fairly
13 conciliatory posture towards these filings that
14 I expressed earlier this week.

15 MS. JONES: Well, what I suggest we do is discuss
16 them separately, but let's discuss both.

17 Or do you see that it would be helpful to look
18 at preordering for resale and UNEs together?

19 MR. ARTMAN: If there are systems and databases out
20 there that contain information that are needed for both
21 processes, as long as we're discussing that system or
22 that database, I don't see any reason it makes sense to
23 break them up into -- into separate discussions.

24 Separate is not equal. I mean we need to have
25 the same types of access, and we need to have access
26 that's focused on the different needs as well.

27 MS. JONES: Well, I know I don't want to hear about
28 all the databases twice and hear the same thing twice.

1 I have a short attention span.

2 But I don't know enough about the systems to
3 know if that would work.

4 So I mean would this work from Pacific's
5 viewpoint?

6 MS. HOWARD: Can we --

7 MS. JONES: We can go off the record for a minute.

8 (Off the record)

9 MS. JONES: We'll be on the record.

10 MS. HOWARD: We can certainly try that.

11 MS. JONES: John?

12 MR. GUTIERREZ: John Gutierrez with Continental
13 again.

14 I would like to ask the question up front,
15 since we're going to do it in that order, does Pacific
16 have the right people in the room today to discuss
17 procedures?

18 I am more than willing to sit through the
19 resale discussion, but I don't want it to be 2:00, 2:30
20 in the afternoon, we get to the facilities-based and all
21 of a sudden we don't have the appropriate people
22 available at that time.

23 MS. HOWARD: (Nodding head)

24 MS. JONES: But I think they just decided we were
25 going to discuss them together, to the extent that the
26 processes are the same or the same databases are used.

27 MR. GUTIERREZ: And I understood that the same.

28 But to the extent they are different, when we

1 get to the end of the day and then we want to get down
2 to a level of understanding on -- in -- I just hope --
3 I just had concern that the right people be available at
4 that time.

5 MS. JONES: Sheila?

6 MS. HOWARD: We have -- it's the same people, we
7 have the right people. We have our subject-matter
8 experts for every one of the areas: billing,
9 provisioning, pre-ordering, ordering, and maintenance.
10 We have our subject matter experts for both areas.

11 MR. GUTIERREZ: Thank you very much.

12 MS. HOWARD: And just one thing.

13 We are going to, at the same time, talk about
14 the resale and the unbundling.

15 MS. JONES: Thank you.

16 MR. GOLABEK: My name's Mike Golabek with GTE.

17 The schedule as proposed, the agenda as
18 proposed, will work for us, too.

19 It would be my understanding, though, that we
20 talk about Pacific on one of these particular subjects
21 and address GTE at or about the same time, as opposed to
22 putting us off till later in the day or the afternoon.
23 Just do it all at once.

24 And we are certainly prepared to -- while we
25 were under the same impression that we would talk about
26 resale, we can talk about the unbundled part of it,
27 too. I think we have folks here that can speak
28 intelligently to it.

1 And I would just add that it was my
2 understanding that we're here so that you all can help
3 us to tell us what we need to be adding to our
4 descriptions here rather than getting into a great
5 detailed discussion of each particular system, which, as
6 I understand, that's what the workshops are for down the
7 road.

8 As I understand this exercise, we're supposed
9 to -- we're here certainly to explain as much as we can,
10 but we're also here to help us better understand how we
11 need to supplement our descriptions.]

12 MS. JONES: We may need to remind ourselves of that
13 periodically through the day.

14 Sheila?

15 MS. HOWARD: Just one question.

16 Would it be possible, since all of us don't
17 know the subject matter experts, that they could
18 identify themselves so we'd know who AT&T has and what
19 their areas of expertise are, and so forth. Introduce
20 themselves and tell us that.

21 It would be helpful to us, please.

22 MS. JONES: Do we need to do that on the record?

23 MS. HOWARD: That might be helpful.

24 MS. JONES: Eric?

25 MR. ARTMAN: Couple of things.

26 One, because of the time frame and because
27 of what the workshop was to cover, we didn't bring a
28 large number of technical experts in, and I wouldn't

1 want there to be any adverse reflection on not having a
2 tremendous attendance of technical experts.

3 I appreciate Pac Bell's effort -- and I don't
4 know to what extent GTE did it -- to make people
5 available, but at the same time my understanding
6 reflects that of Mr. Golabek, that today ought to define
7 what the plan ought to state rather than get into the
8 actual nits and nats.

9 I would appreciate a specific response from
10 Pacific, since they indicated they weren't attending
11 today, as to whether they are addressing unbundled OSS
12 or just retail OSS and their plan is also intended to
13 address resale and unbundled --

14 MR. HURST: You mean what's on file now?

15 MR. KHANNA: On the March 4, 1997 filing?

16 MS. JONES: Let's not speak over each other.
17 Remember, we have a court reporter.

18 So don't contribute something unless
19 you've been recognized. Thank you.

20 That's the disadvantage of having a
21 court reporter.

22 MR. GALLIGAN: Mike Galligan.

23 To answer that question, when we put the
24 document together, we addressed resale and we did that
25 because what we were asked to address is a comparative
26 between retail and resale, and rarely customers don't
27 buy unbundled network elements.

28 MS. JONES: I guess I don't understand what

1 you're saying.

2 So you're saying it is not covered --
3 unbundled elements are not covered, then?

4 MR. GALLIGAN: No, not specifically.

5 In the document that we put together, it was
6 put together with the idea of resale in mind as a
7 comparative to what was done, or the way in which a
8 customer orders on the retail site of Pacific Bell.

9 There is no comparative between CLCs and the
10 retail side of Pacific Bell as it relates to unbundled
11 network elements.

12 MS. JONES: So is this something then that parties
13 would want added to this, recognizing that UNEs are not
14 sold to retail customers, but competitors are interested
15 in the process for ordering UNEs?

16 Michael.

17 MR. HURST: Michael Hurst for AT&T.

18 We don't see a conflict here.

19 One of the main points that the Judge directed
20 the companies to address was how they provided the
21 functionalities to themselves.

22 Not just how they provided services to their
23 retail customers, but how did they get a loop up and
24 running as part of provisioning, how did they get a port
25 and switch up and running as part of providing service
26 to a customer.

27 And so we don't see a conflict here, because
28 in the description of the systems they use, to assign

1 loops and telephone numbers to customers, that -- in
2 their filing -- they're taking unbundled elements,
3 putting them together, and providing them to customers.

4 We're interested in how they do that and what
5 standard they use for themselves when they take a loop
6 and combine it with a port and provide it to the
7 customer.

8 And under the law, the standard, when they
9 provide a loop to us they've got to provide it to us in
10 the same quality and with the same speed and -- the same
11 quality, basically, as they provide it to themselves.

12 So I don't see a difference here between
13 providing the services to their customers using the
14 provisioning system in that provisioning system.

15 We're going to have to talk about how the loop
16 is provided, how the switch, port and switch are
17 provided, and there's where the unbundling comes in.

18 MS. JONES: Okay. Thank you.

19 Any other comments on the agenda?

20 Dhruv?

21 MR. KHANNA: One quick question, is whether we are
22 going to proceed by service, like 1 Measured Business
23 line first and other services.

24 I would be interested in knowing what
25 the order is, because I actually have a hard stop
26 at 2:00 o'clock.

27 MS. JONES: It's my understanding that the Judge
28 just mentioned 1MB as a sample.

1 I'm not going to sit here and go through
2 a whole bunch of services. The rest of you can stay
3 here as long as you want.

4 And I think that was our only mandate, that
5 Pacific should put together some examples.

6 If somebody was here Tuesday and has a
7 different idea of what we were ordered to do, let me
8 know.

9 MR. KHANNA: The reason I raise that question is
10 the 1 Measured Business line analog service raises one
11 set of issues that would not necessarily cover,
12 for example, the loop, what is involved in the digital
13 loop that's needed, for example for ISDN.

14 And certainly that's an interest that
15 my client has, and I would be anxious for this workshop
16 and Pacific to include in its filing exactly what the
17 processes are for providing digital loops to itself and
18 therefore to competitors, because as I understand it,
19 that is quite a cumbersome process that involves
20 significant, ultimately, nonrecurring charges at this
21 time.

22 So that's certainly an area my client is
23 interested in exploring.

24 MS. JONES: Well, you've got that on the record.

25 MR. KOLTO-WININGER: I should say that it was
26 my understanding that subject matter experts would be
27 here so that they could converse in a language that
28 maybe attorneys might not understand.

1 And so I guess we're a little disappointed
2 that other parties have not brought -- or not all the
3 parties have brought their subject matter experts, and
4 we do think that's not a very productive way to approach
5 this workshop.

6 MS. JONES: Eric.

7 MR. ARTMAN: I have to respond.

8 I don't think that was the direction
9 from the ALJ.

10 I think the direction was to try to work
11 on the insufficiencies in the filing from Pacific Bell
12 and from GTE, and to do that with the best response
13 possible.

14 And I've previously explained the situation
15 with technical experts.

16 If we're going to get into back and forth on
17 that issue, we can spend a lot of time on it, but
18 I don't think any more needs to be said.

19 MS. JONES: Why don't we move forward, and I think
20 the first thing we should do is have all the subject
21 matter experts, which I personally refuse to call SMEs,
22 introduce yourself and give your name and the company
23 you work for, and your area of expertise.

24 You're kind of sprinkled in there with
25 attorneys, and to make it easier for the court reporter,
26 why don't you stand up and make sure you don't mumble.

27 MR. GOLABEK: We have four folks from GTE with us
28 who will handle that and introduce themselves and say

1 what their areas are.

2 MR. BILLINGS: My name is Mike Billings with GTE,
3 and my expertise is implementation of open market
4 transition.

5 MR. LANGLEY: Rodney Langley, GTE, local
6 competition implementation.

7 MR. KELLY: Richard Kelly, GTE, open market
8 local competition.

9 MR. SEIBOLD: Chuck Seibold, GTE,
10 provisioning systems.

11 MR. GALLIGAN: Michael Galligan, Pacific Bell,
12 director for resale and OSS product marketing.

13 MR. CHAMBERLIN: Mark Chamberlin, Pacific Bell,
14 business resale business process.

15 MR. VIVEROS: Chris Viveros, Pacific Bell,
16 local competition implementation, preordering and
17 ordering.

18 MR. TENERELLI: Sam Tenerelli, Pacific Bell,
19 local competition, maintenance, and provisioning
20 processes.

21 MS. THOMPSON: Kate Thompson, Pacific Bell, and
22 I have billing and usage delivery.

23 MR. HURST: Michael Hurst, AT&T, regional director
24 and attorney responsible for cost studies.

25 MS. BUSSING: Carol Bussing, AVN of systems
26 planning administration for Sprint, and I have
27 responsibilities all the way through billing.

28 MS. GARRIS: Ellen Garris, Working Assets.

1 I'm the director of local services.

2 MS. JONES: So everyone else in the room is either
3 an attorney or --

4 MS. GARVIN: I'm Dayna Garvin, local service
5 implementation for WorldCom.

6 MS. JONES: Thank you.

7 Have we missed any?

8 (No response)

9 MS. JONES: Okay. Let's go off the record for
10 just a minute.

11 (Off the record)

12 MR. LAKRITZ: We'll be on the record, please.

13 I think we'll start off with Pacific's
14 request, with them providing their billing system.

15 I believe it's on page 5 of a handout that
16 they provided to people that describes their OSS filing
17 and the difference between retail and resale.

18 Sheila, did you want to start?

19 MS. HOWARD: Yes.

20 Kate Thompson will talk about billing.

21 MS. THOMPSON: The exciting subject of billing,
22 which always comes at the tail end of the process.

23 First, I want to just describe what happens
24 in terms of the collection of call record detail.

25 These are reported at the central office
26 switch that the CLEC needs from us in order to pass that
27 along to the end user and bill the end user.

28 For retail services, that process is identical

1 at the switch as it is for retail.

2 In other words, there's nothing that
3 differentiates in the switch that a call is being made
4 from a resold line or if it's being made from a retail
5 line, and it depends on the various switch types,
6 the level of detail of that particular reporting
7 recording.

8 For 1MB type of service, it's a measured
9 business line.

10 What that means is that we'll capture
11 call records for every call made, every attempt made,
12 and pass those records along to -- depending on the
13 switch type and some of the configurations of the
14 switches, it may or may not include the terminating
15 number.

16 It will show the originating number and
17 the connect and disconnect times, and those get sent
18 to the CLECs on either a daily or a weekly basis, and
19 they're unrated records.

20 There's no rating on the records because
21 we assume they'll apply whatever rates are going to be
22 applied to those call types.

23 As the records come in off of the switch,
24 they're processed through a number of modules in
25 our billing system.

26 They're prepared in an EMR format, which is
27 a Bellcore standard format that is used throughout
28 the industry for local call recordings.

1 And that goes out on an NDM feed or mag tape
2 to the CLEC to use and to deal with as they see fit.

3 That's what happens on a resale line.

4 On an unbundled network line, it's very, very
5 similar for a port because you will still need to have
6 Pacific's recording of that call record to pass on to
7 the end user.

8 There are some additional -- both pricing and
9 process -- issues for the unbundled elements, and in
10 some cases you will get terminating usages, and --
11 where the central office switches are limited in the
12 ability to provide that -- and the interconnect
13 contracts calls for some mutual agreements on the
14 process of extrapolating terminating usage for the
15 purpose of billing it to you.

16 So that's sort of, in a nutshell,
17 what happens.

18 MR. LAKRITZ: Just before we start -- excuse me.

19 Jonathon Lakritz for the
20 Telecommunications Division.

21 One question just for clarification.

22 Up until the point at which the record
23 information is conveyed to the competitive carrier or
24 the purchaser of the resold service, I think you said
25 it's the same system and goes through the same system
26 whether it's a Pacific customer or.

27 MS. THOMPSON: It's recorded at the switch in an
28 identical matter and flows through the billing system

1 until it gets to a module that we call usage
2 supervision.

3 But it really is a look-up table that says
4 I have an originating call record from this telephone
5 name, do I send that record on to the retail billing
6 system or do I send it on through the wholesale process
7 to be created into an EMR format to send out to the CLC.

8 So there is a divergence that occurs once that
9 originating number is identified as a resold line.

10 MR. LAKRITZ: Thank you.

11 I think Eric Artman had a question.

12 MR. ARTMAN: Yes. Eric Artman for MFS/WorldCom.

13 You indicated that terminating usage could
14 have some variables and that those would be covered
15 in interconnection agreements.

16 Presumably, the generally-available document
17 that you've provided has some coverage for that.

18 MS. THOMPSON: Yes.

19 MR. ARTMAN: Could you describe how that is, and
20 what other databases that may include?

21 MS. THOMPSON: It doesn't include any additional
22 databases.

23 It does include a change in the way that
24 we're recording that usage in the switch.

25 So when I talked about resold lines, it looks
26 just like a regular retail line. Nothing in the switch
27 identifies it.

28 If it's an unbundled element there will be a

1 unique line CLASS code in the switch that says for this
2 port I need to record some additional information,
3 and that would include some terminating-type usage, if
4 the switch has the capability to do so, which all
5 switches don't have.

6 MR. ARTMAN: And if the switch doesn't,
7 what proposal do you have?

8 MS. THOMPSON: If the switch doesn't have that,
9 we are working on a process that is still in a bit of
10 negotiations, but basically it's extrapolating from sort
11 of a one-for-one, assuming that you get about the same
12 number of incoming as outgoing.

13 And so it would assume an amount of volume
14 of originating usage and assume there was a similar
15 amount of terminating usage.

16 MR. ARTMAN: So you will be proposing a proxy
17 on that?

18 MS. THOMPSON: Right, right.

19 MR. LAKRITZ: Okay.

20 Eric, I think what we kind of want to do is --
21 is your next question having to do with how the OSS
22 system works or how they're planning on charging for
23 particular elements --

24 MR. ARTMAN: No.

25 I was actually going to ask how the OSS --
26 how they propose to do it and if they considered some
27 other alternatives in doing -- I mean if that -- to the
28 extent today's workshop is to clarify what should be in

1 the proposal, I would request that the proposal also
2 include some description of how they have considered
3 recording and processing terminating usage on unbundled
4 network elements including, to the extent necessary,
5 potential switch upgrades.

6 If I could go into that --

7 MS. THOMPSON: I think we have some information.

8 MR. ARTMAN: -- that would be the sort of thing
9 we think needs to be in document.

10 MR. LAKRITZ: That's what I'm trying to do,
11 is focus people back to that.

12 MR. ARTMAN: And you're right.

13 MS. THOMPSON: And that is a universal issue.

14 MS. BUSSING: One thing we wanted to make sure
15 of in the filing was that that detail billing, we would
16 request that in the final -- if it is published, that
17 that data would be on a regular basis, provided on a
18 daily basis to the CLECs.

19 MS. THOMPSON: Right.

20 It's available five days a week, but not
21 realtime, not same day.

22 I just want to make sure I'm clarifying.

23 MS. BUSSING: The following day is what you're
24 saying?

25 MS. THOMPSON: No, no.

26 MS. BUSSING: The following day?

27 MS. THOMPSON: We'll identify the timing with which
28 that usage -- there's a difference between when the

1 usage is available for you to receive and what time
2 frame that usage covers.

3 MS. BUSSING: What is it? Can I ask that?

4 MR. LAKRITZ: One second.

5 Let's have that answered in the filing.

6 And the other thing, when one person stops,
7 give a break for the court reporter to catch up.
8 She can't do a realtime interexchange back and forth.

9 MS. THOMPSON: We do have that data and we are
10 sharing it specifically.

11 MR. LAKRITZ: The gentleman in the back.

12 MR. HARRIS: Glenn Harris from Brooks Fiber.

13 You mentioned that this data is available via
14 the Network Data Mover and also I guess a mag.

15 MS. THOMPSON: Magnetic tape cartridge.

16 MR. HARRIS: How do CLECs obtain this information?

17 Is it provided through Pacific Bell, and if
18 so, can you provide information in a supplemental filing
19 with regard to costs for the NDM, and also who to
20 contact at Pacific Bell?

21 MS. THOMPSON: I'm not sure how I could --

22 MS. HOWARD: Sheila Howard, Pacific Bell.

23 We certainly wouldn't be putting costs in
24 this document, but we certainly can talk to you about
25 how one would go about retrieving or getting that
26 information from Pacific Bell.

27 So we can include that.

28 But they would not be in costs, not in this